



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

July 7, 2016

heather.bleemers@lacity.org

darlene.navarrete@lacity.org

Heather Bleemers, City Planning Associate
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, 7th Floor
Los Angeles, CA 90012

**Draft Mitigated Negative Declaration (DMND) for the Proposed Project at
15353-15385 W. Weddington Street in the Van Nuys - North Sherman Oaks Area
in the City of Los Angeles (ENV- 2014-4618)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

Project Description

The Lead Agency proposes to demolish the existing three-story 169-unit apartment building and associated amenities and construct five, four-story condominiums for a total of 270 units. The new condominium development will also include two levels of subterranean parking. Soil disturbance activities during construction will include the excavation of the parking garage requiring approximately 90,000 cubic yards of soil to be removed.

Regional Air Quality Analysis

In the DMND, the Lead Agency has determined that the project's air quality impacts are less than significant during construction and operation but the DMND does not quantify short- or long-term air quality emissions. Without quantifying project air quality impacts, the Lead Agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis and mitigation pursuant to the California Environmental Quality Act (CEQA). Therefore, the SCAQMD staff recommends that the Lead Agency demonstrate that the project impacts are less than significant in the Final MND by estimating short- and long-term air quality impacts using the current version of California Emission Estimator Model (CalEEMod)¹. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse gas (GHG) emissions. The Lead Agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook².

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

Localized Significance Thresholds Analysis

The proposed project is also adjacent to sensitive land uses³ (i.e., single- and multi-family residences south and east of the proposed site); however, the DMND did not evaluate potential localized air quality impacts resulting from construction of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. These potential air quality impacts should be analyzed using SCAQMD's Localized Significance Methodology⁴.

Health Risk Assessment

The Lead Agency also notes in the project description that the future residences will be sited less than 500 feet east of the Interstate 405 (I-405) freeway. The I-405 freeway⁵ has an average daily traffic volume of 215,000 vehicles⁶ which includes more than 7,439 diesel-fueled trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant and a carcinogen. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)⁷ to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter.

CARB Guidance Regarding Residences Sited Near a High-Volume Freeway

Numerous health studies have demonstrated potential adverse health effects associated with living near highly travelled roadways. As a result of these studies, the California Air Resources Board (CARB) developed a Land Use Handbook⁸ that recommends avoiding the siting of housing within 500 feet of a freeway. Additional research has shown that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging⁹.

While the health science behind recommending against placing new homes in close proximity to freeways is clear, SCAQMD staff recognizes that there are many factors lead agencies must consider when siting new housing. Further, many mitigation measures have been proposed for other projects to reduce exposure, including building filtration systems, sound walls, vegetation barriers, etc. However, because of the potential adverse health risks involved with siting housing near a freeway, it is essential that any proposed mitigation must be carefully evaluated in order to determine if those health risks would be brought below recognized significance thresholds.

Limits to Enhanced Filtration Units

The Lead Agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters¹⁰ similar to those proposed for this project, costs were expected to range from

³ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

⁴ The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

⁵ Aerial map inspection.

⁶ 2014 Traffic Volumes on California Highways. The peak month ADT is the average daily traffic for the month of heaviest traffic flow.

⁷ "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

⁸ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

⁹ See Chapter 9 of the 2012 AQMP for further information. Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>

¹⁰ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.

\$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors and does not account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

Compliance With SCAQMD Rules

Finally, the project includes demolition, so the Lead Agency should discuss and provide additional information regarding compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities in the Final MND. In the event that soils containing petroleum hydrocarbons are encountered during soil disturbance activities, that portion of the proposed project will be subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. The Final MND should also include how the Lead Agency will comply with Rule 1166.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist at (909) 396-3302, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Barbara Radlein

Barbara Radlein
Program Supervisor, CEQA Special Projects
Planning, Rule Development & Area Sources

BR:GM

LAC160616-12
Control Number